PROJECT SUMMARY

I. INTRODUCTION

Rohm & Haas Chemicals LLC currently operates under federally enforceable state operating permit (FESOP). The company requested a renewal of their FESOP to continue to operate as non-major source for the purposes of the Clean Air Act Permit Program (CAAPP). Production and emission limitations, as well as monitoring and recordkeeping conditions contained in the FESOP have prevented the facility from being a major source and will assure this status in the future. These conditions would be enforceable by both the State of Illinois and USEPA.

II. SOURCE DESCRIPTION

Rohm & Haas Chemicals LLC operates a biocide production facility located at 1645 South Kilbourn Avenue, Chicago. The equipment at the facility that requires air pollution control permits includes biocide production lines.

III. EMISSIONS

The main sources of emissions at this facility result from the biocide production lines. These emissions primarily consist of Volatile Organic Materials (VOM) and Hazardous Air Pollutants (HAP). The facility has limited their material throughput such that it will keep these emissions below major source threshold levels of 100 tons perm year for VOM, 10 ton per year for each individual HAP and 25 tons per year for combined HAP. All other air emissions are well below the 100 ton per year major source threshold levels.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of volatile organic materials (VOM) and hazardous air pollutants (HAPs) emissions.

V. PROPOSED PERMIT

The conditions of the proposed permit contain limitations and requirements to assure that this facility will be operated as a non-major source. The permit sets limitations on coatings usage. These limitations are consistent with the historical operation and capacity of the facility.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the

facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the facility meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a permit with federally enforceable limits for this operation.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 Ill. Adm. Code Part 166.

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